

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA )

Plaintiff, )

vs. )

NICHOLAS WRIGHT, )

Defendant. )

CASE NUMBER 20-MJ-7136-MAB

FILED UNDER SEAL

CRIMINAL COMPLAINT

I, Jake Frechette, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count 1

**Attempted Commercial Sex Trafficking of a Child**

On or about June 27, 2020, the defendant,

**NICHOLAS WRIGHT,**

in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, did knowingly, in and affecting interstate commerce, attempt to recruit, entice, and obtain, by any means, a person knowing that the person had not attained the age of 18 years, knowing that the person would be caused to be engaged in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591 and 1594(a).

Count 2

**Attempted Enticement of a Minor**

On or about June 27, 2020, the defendant,

**NICHOLAS WRIGHT,**

in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, using facilities of interstate commerce, that is a cellphone connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution or sexual activity under such circumstances as would constitute a criminal act under 720 ILCS 5/11-1.60(d) (Aggravated Criminal Sexual Abuse), in violation of 18 United States Code, Section 2422(b).

**Count 3**  
**Travel With Intent to Engage in Illicit Sexual Conduct**

On or about June 27, 2020, the defendant,

**NICHOLAS WRIGHT,**

in the Southern District of Illinois and the Eastern District of Missouri, and elsewhere, the defendant, did travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18 United States Code, Section 2423(f), with another person, in violation of Title 18, United States Code, Section 2423(b).

I further state that this complaint is based on the following facts:

**AFFIDAVIT**

**INTRODUCTION**

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) assigned to the FBI's Springfield Division, Fairview Heights Resident Agency, in Fairview Heights, Illinois. I have been employed by the FBI since January 2019. My employment has vested me with the authority to investigate violations of federal law, including Title 18, U.S.C. §§ 2242, 2252,

2252A, all involving the Sexual Exploitation and Other Abuse of Children. During my time at the FBI Academy and while working the violation, I have received training in a variety of investigative and legal matters, including topics of searches, drafting search warrant Affidavits, and Probable Cause. I am presently assigned to the Springfield Violent Crimes Against Children Squad, which focuses on investigating individuals and dismantling organizations responsible for the sexual exploitation of children through the manufacture and distribution of child pornography. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. In connection with such investigations, I have served as case agent, have been the affiant for several search warrants and I have conducted interviews of subjects, victims, and witnesses. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that NICHOLAS WRIGHT committed violations of Title 18, United States Code, Sections 1591 and 1594(a), 2422(b), and 2423(b).

**BACKGROUND OF INVESTIGATION AND  
FACTS ESTABLISHING PROBABLE CAUSE**

4. On June 26 and 27, 2020, agents from the Federal Bureau of Investigation, along with a joint taskforce of various state and federal law enforcement agencies conducted an undercover investigation targeting subjects who were attempting to engage in sexual activity with minors.

5. Starting on approximately June 19, 2020, through June 26, 2020, undercover agents began posting ads on various online social media and dating platforms and applications. The ads were primarily dating profiles showing photos of young-looking male and female adult confidential sources. The ads all state that the person's age is 18 as that is the minimum age required for the websites.

6. A residence in Collinsville, Illinois was obtained to be the location that targets were directed to for engaging in sexual activity with the fictitious minors from the online profiles.

7. On approximately June 27, 2020, an FBI Online Covert Employee ("OCE") was in a St. Louis group chat in a mobile messaging application.

8. An individual who was later identified as NICHOLAS WRIGHT (hereinafter referred to as "WRIGHT") initiated a conversation with OCE, whose profile displayed the name "Bailey Hammer". The conversation proceeded as follows:

OCE: What are you wanting to do  
WRIGHT: What are you wanting me to?  
OCE: Your choice  
WRIGHT: I need to be sucked and fucked honestly but this is seeming too easy lol  
OCE: What do I get in return  
WRIGHT: What are you asking?



WRIGHT: ???  
OCE: I've got needs to  
WRIGHT: What would you need?  
OCE: \$  
.....  
WRIGHT: 40?  
OCE: That works  
WRIGHT: And you host and suck and fuck?  
OCE: Yeah but you have to wear a condom.  
WRIGHT: Hmmm... How about 30 and only suck?  
OCE: That's fair  
....  
OCE: One last thing I'm 15 so you can't say shit about this. Deal?  
WRIGHT: You can't either. But how do i know this isn't a setup?  
OCE: Cause I'm not a bitch.  
....  
WRIGHT: Have you swallowed before?  
OCE: Of course  
WRIGHT: K  
...  
WRIGHT: Will 25 work? Gotta go to bank otherwise  
OCE: No less  
WRIGHT: K

9. The conversation continued regarding planning a meet up time and location. A meeting was tentatively set after 2:45 PM at the undercover house in Collinsville, Illinois. The subject agreed to meet the minor from the application on June 27, 2020 at the minor profile's residence for a sexual encounter.

10. WRIGHT drove to the residence and law enforcement agents subsequently contacted the subject and took him into custody.

11. During a search incident to arrest, agents located \$30.00 in United States Currency on his person.

12. WRIGHT was interviewed on location immediately following the arrest.

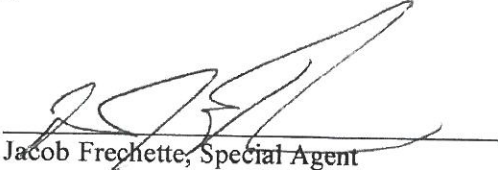
13. During an interview, WRIGHT admitted that he was the one who had been chatting with "Bailey Hammer", the OCE profile and he was aware that she was a minor.

14. WRIGHT further admitted that he drove from the southern suburb of St. Louis, Missouri to Collinsville, Illinois to meet with "Bailey Hammer" for a sexual encounter. WRIGHT stated that he brought the money to pay "Bailey Hammer" for sex. Specifically, he planned to pay "Bailey Hammer" \$30.00 for oral sex.

**CONCLUSION**

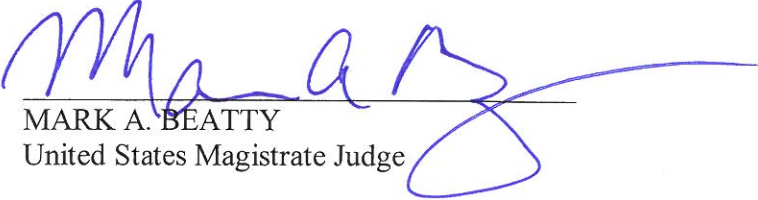
15. Based on the foregoing, I submit that there is probable cause to believe that on June 27, 2020, NICHOLAS WRIGHT committed the offenses set forth in Counts 1, 2, and 3 of this Complaint.

...

  
Jacob Frechette, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this

29th day of June, 2020, in the Southern District of Illinois.

  
MARK A. BEATTY  
United States Magistrate Judge

STEVEN D. WEINHOFER  
United States Attorney

  
KARELIA S. RAJAGOPAL  
Assistant United States Attorney